IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN THE MATTER OF THE COMPLAINT OF	)	
CENTRAL CONTRACTING & MARINE, INC.	)	
FOR EXONERATION FROM, OR	)	Cause No: 4:15-CV-01111-HEA
LIMITATION OF, LIABILITY.	)	

CLAIMANT ST. LOUIS BRIDGE CONSTRUCTION COMPANY'S
MOTION FOR PROTECTIVE ORDER

COMES NOW St. Louis Bridge Construction Company (hereinafter "St. Louis Bridge") by and through its attorneys, Charles J. Swartwout, Andrew C. Corkery and the attorneys of Boyle Brasher LLC, and pursuant to Rule 26(b)(1) claimant moves for the entry of a protective order to quash the notices of deposition received for the depositions of Pat Dolan and Nickolas Carson.

1. Central Contracting & Marine, Inc. ("CCM") set the depositions of St. Louis Bridge employees Nickolas Carson and Pat Dolan for November 9, 2016 and November 11, 2016, respectively.

2. Due to conflicts because of a time sensitive project that St. Louis Bridge has been hired to work on, Mr. Dolan and Mr. Carson cannot be available for deposition on the dates their depositions are noticed for.

3. Claimant St. Louis Bridge offered alternative dates for the depositions, but CCM refused to agree to move the depositions.

4. Claimant incorporates its Memorandum of Law In Support of this Motion for Protective Order as if fully set forth herein.

WHEREFORE, Claimant St. Louis Bridge Construction Company prays this Court enter a protective order quashing the deposition notices of Nickolas Carson and Pat Nolan and for such further relief as the Court deems appropriate.

BOYLE BRASHER LLC

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CERTIFICATE OF SERVICE

I certify that on **October 27, 2016**, I electronically filed St. Louis Bridge Company's Memorandum of Law in Support of Its Motion for Protective Order with the Clerk of Court using the CM/ECF system, which will send notification of such filing(s) to the following:

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

☐ (No manual recipients)

/s/ Andrew C. Corkery